

## **CLARK COUNTY INDUSTRIAL PROGRAM AND ENFORCEMENT RESPONSE PLAN (ERP)**

### **Foreword**

In 1972, The Federal Water Pollution Control Act [also referred to as the Clean Water Act ("CWA")] was amended to provide that the discharge of pollutants to waters of the United States from any point source is unlawful, unless the discharge is in compliance with National Pollutant Discharge Elimination System (NPDES) permit. The 1987 amendments to the CWA added section 402(p), which directs that stormwater discharges are point source discharges and established a framework for regulating municipal and industrial storm water discharges under the NPDES program. On November 16, 1990, the U.S. Environmental Protection Agency ("EPA") promulgated final regulations that establish the stormwater permit requirements.

Pursuant to these regulations, stormwater permits are required for discharges from a Municipal Separate Storm Sewer System (MS4) serving a population of 100,000 or more. EPA defined MS4s to include road systems owned by jurisdictions which are in an area with a population greater than 100,000. The regulations also specified a requirement for stormwater permits from 11 categories of industry, including construction activities.

Activities that take place at industrial facilities, such as material handling and storage, equipment operation and maintenance, etc. are often exposed to outside elements. As runoff from rain, snowmelt, or irrigation comes into contact with these materials, it transports pollutants to nearby storm sewer systems, Las Vegas Wash, and Lake Mead. In the Las Vegas Valley there is a joint MS4 permit between the Regional Flood Control District (RFCD), Cities of Henderson, Las Vegas, North Las Vegas, (Cities) and unincorporated Clark County (County) to control stormwater pollution. The MS4 Permit was issued by the Nevada Division of Environmental Protection (NDEP).

### **Introduction**

The Industrial Facility Monitoring and Control section of the MS4 Permit requires that Clark County create a program to monitor and control pollutants in stormwater discharges to public storm systems from the following types of facilities:

1. Municipal landfills,
2. Hazardous waste treatment facilities,
3. Disposal and recovery facilities, industrial facilities that are subject to section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), and
4. Industrial facilities that the County determines are contributing a substantial pollutant loading to the public storm sewer system.

This document will outline the identification process for industrial facilities that need inspection, inspection priorities and frequency, inspection procedures, the process for informing the facility owner/operator of violations and the requirements for establishing and maintaining control measures, follow-up inspections, enforcement escalation in the event of non-compliance, appeals, inspector training, legal authority and record keeping.

Clark County has assigned the duty of managing the MS4 Permit to Water Quality Planning (WQ) that is housed at the Clark County Water Reclamation District (CCWRD).

## **Identify Facilities for Inspection**

The following is a description on how Clark County identifies facilities that need to be inspected from the four categories above and that are included in the Industrial Inventory:

**Municipal Landfills** – There are currently no active municipal landfills within the MS4 permit boundaries identified in the SWMP.

**Hazardous waste treatment, disposal and recovery facilities** – The EPA keeps a list of hazardous waste treatment, disposal, and recovery facilities that are subject to the Resource Conservation and Recovery Act (RCRA). The EPA's RCRA Info web site [www.epa.gov/enviro/html/rcris/rcris\\_query.html](http://www.epa.gov/enviro/html/rcris/rcris_query.html) is searched annually to find hazardous waste treatment and disposal facilities within the County's jurisdiction in the Las Vegas Valley.

**SARA facilities** - The EPA regulates and maintains a list of industrial and other facilities that release certain amounts of regulated chemicals into the environment. The EPA's website [www.epa.gov/enviro/facts/tri/search.html](http://www.epa.gov/enviro/facts/tri/search.html) is searched annually for a list of all Toxics Release Inventory (TRI) facilities in Clark County.

**Industrial facilities that the County determines are contributing a substantial pollutant loading to the public storm sewer system.** Even though Clark County believes there are no industrial facilities that contribute a substantial pollutant loading to the MS4 the following is a summary of facilities that are, nevertheless, inspected to check for possible substantial pollutant loadings:

- **NDEP Industrial Stormwater Permit Filers** – This list is checked periodically and any new filers within Clark County's jurisdiction and the permit boundary are added to the industrial inventory.
- **Fire Department Category 1 & 2 Facilities** – The Fire Department is contacted periodically for their list and these facilities are added to the industrial inventory.
- **Southern Nevada Health District (SNHD) waste haulers** – The SNHD is contacted periodically for their list of waste haulers and these facilities are added to the industrial inventory.

- **Clark County Business License Database** – This database is searched periodically for businesses that are categorized or have NAICS codes the same as other business that are already on Clark County’s industrial inventory. These facilities are then added to the inventory.
- **Casinos** – Major casinos within the County’s jurisdiction are included on the inventory because of their size and types of activities going on at the facilities like recycling, landscaping, power generation, remodeling, etc.
- **Complaints/Spills** – Some complaints/Spills that are received identify facilities that may need ongoing inspections so these types of are included in the industrial inventory.
- **Facilities identified by Clark County Water Reclamation District (CCWRD) Pretreatment Inspections** – While doing sanitary sewer pretreatment inspections at approximately 4,500 facilities, pretreatment inspectors also conduct stormwater inspections at sites that have stormwater issues. Any of these sites with significant stormwater issues will be added to the Industrial Inspection Inventory.
- **Facilities identified while in the field** - While doing inspection other facilities that look like they should be inspected are often identified. These types of facilities are added to the Industrial Inspection Inventory.

### **Removing Facilities from the Industrial Inspection Inventory**

The following are a list of reasons why facilities can be removed from the County’s Industrial Inspection Inventory:

- The facility has received an NDEP Filers Waiver.
- Upon inspection it is determined that the facility doesn’t need to be inspected because it has no exposure or no discharge, no potential for discharge, etc.
- The business is temporarily or permanently closed.
- The business has moved to a different jurisdiction.

### **Inspection Prioritization and Frequency**

**First Priority** – The following types of inspections are considered first priority:

- **Complaints/Spills** are considered first priority and they are typically investigate/inspected within 1 – 7 days. Depending on the type of complaint and what is found during the investigation some complaints might be added to the Industrial Inspection Inventory, which would trigger ongoing inspection with a different priority.

- **Follow-up inspections** are considered first priority and they are typically inspected or corrections are verified within 30 days or as noted on the inspection report.

**Second Priority** – The following types of inspections are considered second priority and are inspected annually:

- Municipal Landfills
- Hazardous waste treatment, disposal and recovery facilities
- SARA facilities

**Third Priority** - The following types of inspections are considered third priority and are inspected every 2 – 5 years:

- NDEP Industrial Stormwater Permit Filers (Note: If possible filers will be inspected annually)
- Fire Department Category 1 & 2 Facilities
- Southern Nevada Health District (SNHD) waste haulers
- Facilities identified by Clark County Business License Database
- Casinos
- Facilities identified by Clark County Water Reclamation District (CCWRD) Pretreatment Inspections
- Facilities identified while in the field

## **Inspection Procedures**

Inspections for industrial and commercial facilities identified as needing stormwater inspection to verify compliance with the MS4 permit and Clark County regulations are done by the following inspectors:

- CCWRD Pretreatment Inspectors
- WQ outside Contractor
- WQ Staff

Using the latest inspection checklist developed by SQMC, the inspectors walk the whole site and fill out the checklist and assess the potential for discharge to the MS4 due to the amount and type of materials, handling and storage areas, and industrial process areas that are exposed to rainfall or runoff. The inspectors will observe whether areas are covered by shelters or contained within structures or secondary containment. If the areas are exposed Best Management Practices (BMP's) must be in place that prevents a pollutant discharging into the MS4 with site runoff. BMP's include temporary or permanent control measures to retain or

filter runoff leaving a facility and policies and procedures for spill and leak control, clean-up, housekeeping, employee training, and other measures to minimize the potential for materials from leaving a facility. The inspection process will review the facility's management practices for compliance with local ordinances and regulatory mechanisms. The control measures on a facility must be adequate for preventing the pollutants from leaving the site and must be maintained on a regular basis. The inspector will also inspect any on-site storm drain systems as well as the perimeter of the site, drop inlets, drainage swales and channels, and other components of the MS4 to determine if a discharge has taken place. If there is evidence that a discharge of a pollutant has occurred then it may be judged that the current control measures in place are not adequate. The inspector's judgment will be based on experience and training. The inspectors will be provided training on a regular basis to ensure that they are familiar with changes in requirements, new and improved control measures, or changes to the inspection program. **Appendix A** includes an Industrial Inspection SOP, flow charts, organizational chart, and other information related to the enforcement process.

### **Industrial Facility Owner/Operator Notification**

Upon arrival at a commercial or industrial facility to conduct a stormwater inspection, the facility owner/operator or their designee will be contacted, if possible, and notified that a stormwater inspection will be done. In some cases for larger facilities, secured facilities, or for other reasons, the inspections are scheduled in advance to facilitate the inspection and to make sure the proper representative is present during the inspection. The owner/operator or their designee is encouraged to accompany the inspector but it is not required. Once the inspection is complete the inspector will sit down with the facility representative and go over the following items:

- Inspection findings,
- pass/fail,
- required corrections,
- deadlines,
- follow-up inspection requirements,
- verify contact information,
- review SWPPP and NOI if needed and available,
- review any other pertinent information and address any questions, and
- notify the representative that the official copy of the inspection report will be emailed or mailed to the address provided.

A copy of the inspection report is typically emailed to the facility owner/operator within 3 working days along with any appropriate education and outreach material. If needed a follow-up inspection is typically scheduled within 7-30 days.

## Enforcement

The enforcement process begins with the corrections that are noted on the inspection checklist. Facilities are typically given 7-30 days to make the corrections and provide photos or documentation that the corrections have been made. If major changes such as structural BMPs are required, a schedule for completing the changes as well a description of any temporary BMPs must be provided within a reasonable time frame.

During the follow-up inspection the inspectors will meet with the facility representative, if possible, to review the following items:

- The corrections outlined in the inspection report.
- The site's Stormwater Pollution Prevention Plan (SWPPP) if any,
- Verify any violations have been brought into compliance and if needed the SWPPP revised.
- Verify that there are no other outstanding issues and
- Answer any questions that the facility representative may have regarding the inspection.

If the corrections have been adequately completed when the follow-up inspection is done then a new inspection report is filled out and emailed to the site owner/operator noting the site is in compliance.

If the follow-up inspection finds that the corrections haven't been adequately made then the industrial/commercial facility is notified that a Notice of Storm Sewer Discharge Violation (NOV) will be processed. WQ is notified and processes a NOV, which is sent to the facility via certified mail along with appeal procedures. The NOV details the items that must be corrected, the deadline, potential fines if not corrected, and the appeals process. **Appendix A** shows a detailed NOV standard operating procedures. The following matrix shows a summary of department personnel that conduct inspections and enforcement escalation:

**Enforcement Escalation Matrix**

Commercial/Industrial Inspector	Inspection Checklist with corrective actions	Follow-up Inspections with corrective action or compliance	Cease Order	NOV	Citation	Injunctive Order
CCWRD Pretreatment	x					
WQ Contractor	x	x				
WQ	x	x	x	x	x	x

## **Appeal Process**

In the event of an appeal, the facility owner/operator may request a meeting with the inspector and/or WQ staff. The meeting will allow the operator and County staff to review the BMP's in the field, the site conditions, and discuss the inspection findings. County staff can reverse or reinforce the findings of the inspection, the operator can work out a settlement to bring the site into compliance, or within 10 business days of the service of the NOV, the operator must request a hearing with the hearing officer. The full appeal process is covered in Section 24.40.041 of the Clark County Code. During the appeal process sanctions against the site for non-compliance will be suspended until the site is brought into compliance or the appeal process runs its course. If the site operator is found in non-compliance, the site must be brought into compliance and a re-inspection scheduled within 7-days after the end of the appeal process.

## **Inspector Training**

Stormwater training is provided to all key Clark County personnel that are involved with the MS4 Stormwater Permit every 1 – 3 years. The training is provided by Clark County Water Quality Planning staff using PowerPoint presentations, Excel Visual stormwater training videos, outreach and education material, and Q & A. Training topics include Clean Water Act basics, Federal, State, and Local regulation, delegation of authority, MS4 Permit requirements, and illicit discharge detection and elimination (IDDE). County Staff that perform inspections are given additional training on inspection procedures & requirements, BMPs, inspection checklist, follow-up procedures, and enforcement escalation procedures. Acceptable control measures and BMP's for the local conditions, and their acceptable installation and maintenance requirements are also discussed. New inspectors are also provided the following field training:

- New inspectors typically shadow more experienced inspectors while they do between 4 – 10 stormwater inspections depending on the inspector's background and experience.
- New inspectors then perform between 4 – 10 inspections while being supervised by a more experience inspector.

County Departments and Agencies that receive training include; Public Works, Building Department, Real Property Management, Automotive, Air Quality, Water Reclamation District, Southern Nevada Health District, and SNWA/Las Vegas Valley Water District. Clark County Water Quality Planning also provides stormwater training to residents, and commercial / industrial facilities upon request. An electronic spreadsheet with the date, department, agency, company, type of training event, number of attendees, along with a scanned PDF of the sign-in sheets, and the PowerPoint presentations are saved electronically on the server by Water Quality Planning staff. All of this information is provided for the Annual MS4 Permit report. Other than updated training modules, no changes or updates are proposed for our training record procedures.

## Legal Authority

**Clark County Code Chapter 24.40 – Storm Sewer System Discharge Purpose and Scope.** The purpose of this chapter is to control discharges to the maximum extent practicable into the storm sewer system of unincorporated Clark County within the Las Vegas Valley as delineated in the SWMP. Provisions in Chapter 24.40 that provide means to enforce the regulations include the following:

- 24.40.032 a) Inspection. Any person who discharges or has the potential to discharge into the storm sewer system shall allow the county manager to enter and inspect the premises at any reasonable time to determine compliance with the provisions of this chapter. This right of entry shall include access to all parts of the premises as necessary to make this determination.
- 24.40.032.b As necessary, the county may require monitoring at the sole expense of owner or operator
- 24.40.032.c As Necessary, the county may require BMP's to be installed and maintained at the sole expense of the owner or operator
- 24.40.041 Notice of Storm Sewer Discharge Violation (NOV), with civil penalty of \$1,000 per day per violation
- 24.40.043 Injunctive relief through the district court for permanent or temporary injunction, restraining order or other appropriate order.
- 24.40.044 Misdemeanor
- 24.40.045 Misdemeanor citation

In addition to Clark County's stormwater ordinance, other county regulations that benefit stormwater include the following:

Code	Description	Department	Stormwater Benefit
<b>9.08</b>	Air Quality & Environmental Management	Air Quality	Provides dust control, trackout and other control measures that help protect stormwater.
<b>10.36</b>	Animals - Noise, waste, restraint, sanitation & dead animals	Animal Control	Provides for requirements for waste and sanitation, which benefits stormwater
<b>10.40</b>	Enforcement	Animal Control	Provides for enforcement, which benefits stormwater
<b>11</b>	Abatement and Nuisances	CCPRO	Provides for abatement and enforcement of regulations that protect stormwater
<b>30</b>	Open Space Requirements covered in several chapters	Comprehensive Planning	Requires open space for developments, which reduces stormwater runoff



<b>30.52</b>	Off-Site Development Requirements	Comprehensive Planning	Requires landscaping and screening, which reduces stormwater runoff
<b>30.52.050</b>	Improvement Standards	Comprehensive Planning	Includes Drainage design standards, including RFCD HCDDM Section 1200 & 1500 requirements, which protect stormwater
<b>30.56.100</b>	Design Standards -Hillside Development	Comprehensive Planning	Hillside design standards reduce erosion and limit development in steep areas
<b>30.68</b>	Site Environmental Standards	Comprehensive Planning	Sets requirements to protect environment

## Complaints/Spills

WQ is responsible for addressing stormwater Complaint/Spill issues concerning pollutant discharges within the County's jurisdiction in the Las Vegas Valley. Complaints/Spills are received various ways including but not limited to the following:

- NDEP Complaint/Spill Reports
- EPA National Tips Database
- WQ website: [www.ClarkCountyNV.com](http://www.ClarkCountyNV.com) Keyword "water quality"
- WQ complaint email: [waterquality@cleanwaterteam.com](mailto:waterquality@cleanwaterteam.com)
- WQ complaint phone: 702-668-8674
- County Staff notification
- Illicit connections or discharges identified during bi-annual wash walks.
- Clark County complaint system: <https://clarkconnect.clarkcountynv.gov/>

Once a complaint is received it is logged in the Complaint/Spill Database maintained by WQ. An investigation will be conducted by WQ or its designee for each complaint and the findings and results documented in the database. If an inspection is needed WQ or its designee will inspect the site and use enforcement procedures if necessary. If warranted any facilities identified through the complaint process that need ongoing inspections will be added the industrial inspection inventory. A detailed SOP for addressing complaints is contained in **Appendix A**.

## Illicit Discharge Detection and Elimination (IDDE)

Clark County WQ coordinates closely with the Clark County Public Works Road Division regarding IDDE. The Public Works Road Division has staff in the field doing street sweeping, drop inlet cleaning, detention basin cleaning, maintenance, spill response, and spring and fall wash/channel walks so they are first line of defense for IDDE. Other key personnel from the

following County Departments and Agencies are also included in the IDDE process and are provided training regarding stormwater, IDDE, and how to report illicit connections to WQ:

- Public Works inspectors
- Building Department inspectors
- Real Property Management/Parks
- Automotive
- Air Quality
- Water Reclamation District
- Southern Nevada Health District, and
- SNWA/Las Vegas Valley Water District

Once WQ is notified of a possible illicit connection or discharge it is investigated and processed as a complaint. The complaint process is outlined above and in the complaint SOP contained in **Appendix A**. An IDDE process flow chart, IDDE Organizational Chart, and a recent IDDE enforcement cases are also contained in **Appendix A**.

In addition to repairs necessary to prevent future illicit discharges, resolution of an active illicit discharge may also require clean-up. Appropriate agencies may need to be contacted to initiate clean-up efforts. The entity's enforcement authority allows the entity to require that the party responsible for the illicit discharge abate or remediate any pollution or hazards resulting from the illicit discharge, including the restoration of affected property. Penalties may be issued to cover remediation costs, as well as costs associated with the entity's administrative monitoring of clean-up efforts. Managing clean-up efforts is at the direction of the entity's MS4 Representative.

### **Record Keeping and Retention Policy**

All records generated in the course of Clark County Water Quality Planning business that relate to the NPDES MS4 permit, including but not limited to: emails, database records, stormwater inspection checklists, photographic documentation, Cease Orders, NOV's, and reports are saved electronically and kept a minimum retention period of three years after the MS4 permit expires as required by the NDEP. Records may be retained for a longer time period should business needs dictate. Records are maintained in electronic format on Clark County Water Reclamation District computer systems. Certain records, such as those associated with the industrial stormwater inspection database are maintained by the software developer on a cloud-based system. A record retention SOP is in **Appendix A**.

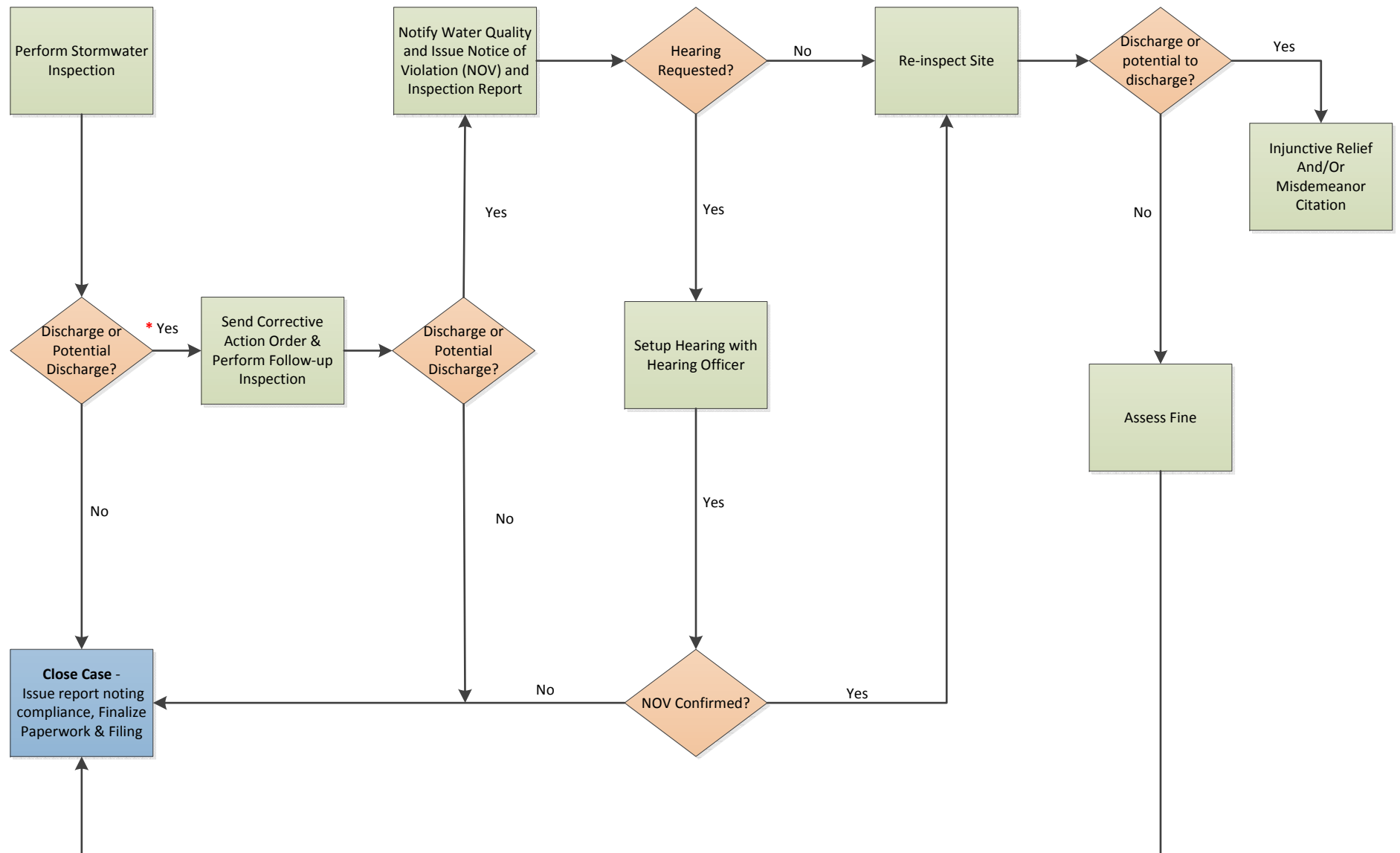
Annual MS4 reporting information is prepared and submitted to NDEP by the Stormwater Quality Management Committee (SQMC) each fiscal year to meet permit reporting requirements. The annual report data is permanently saved and is available at the following website: <http://www.lvstormwater.com/>

# Appendix A

The following Clark County enforcement related documents are contained in **Appendix A:**

1. Enforcement Response Plan Flow Chart
2. Industrial/Commercial inspection enforcement escalation process flow chart and organizational chart
3. Industrial Inspection Standard Operating Procedure (SOP)
4. Notice of Violation (NOV) SOP
5. Sample NOV Letter and Cease Order Letter
6. Complaint SOP
7. IDDE Process Flow Chart
8. IDDE Organizational Chart
9. IDDE Recent Enforcement Cases
10. Record Retention SOP

# Clark County Enforcement Response Plan Flow Chart



\* If an active illicit discharge is found the inspector should notify the site operator to stop the discharge immediately and process enforcement

# **Clark County Industrial Inspection Enforcement Response Procedures & Organizational Chart**



# Clark County Industrial Stormwater Inspections are done by the following group's:

- Clark County Water Reclamation District Pretreatment Inspectors
- Clark County – Consultant (HERServices)
- Clark County – Water Quality Planning (WQ)

**Note:** Each group noted above has a slightly different enforcement process. The following 3-slides show each groups enforcement process.

# Industrial Inspection & Enforcement Process

Clark County Water Reclamation District Pretreatment Inspectors

**Were potential violations found?**

No

Record inspection  
Checklist in LINKO  
Database

\* Yes

Did the contractor  
address potential  
violations while onsite?

Yes

Make note of corrections and  
record inspection Checklist in  
LINKO Database

No

Provide 7 - 30 days to address issues,  
record inspection in LINKO Database and  
forward to WQ for follow-up inspection.  
Were violations still present?

No

Record inspection in LINKO Database  
If not resolved escalated to NOV  
- May result in fines  
- Inform NDEP of potential violations  
of State industrial permit

Yes

\* If an active illicit discharge is found the inspector should notify the site operator to stop the discharge immediately and forward the Case to WQ for enforcement.



# Industrial Inspection & Enforcement Process

Clark County – Consultant (HERServices Inc.)

## Were potential violations found?

No

Record Checklist  
inspection in LINKO  
Database

\* Yes

Did the contractor  
address potential  
violations while  
onsite?

Yes

Make note of corrections  
and record inspection  
Checklist in LINKO  
Database

No

Record in LINKO Database  
Provide 7 – 30 days to address  
issues and re-inspect site.  
Were violations still present?

No

If not resolved escalated to NOV  
- May result in fines  
- Inform NDEP of potential  
violations of State Industrial permit

Record in LINKO Database and  
Escalate Inspection to WQ

Yes

\* If an active illicit discharge is found the inspector should notify the site operator to stop the discharge immediately and forward the Case to WQ for enforcement.





# Industrial Inspection & Enforcement Process

Clark County - Water Quality Planning (WQ)

**Were potential violations found?**

No

\* Yes

Record  
inspection  
Checklist in  
LINKO Database

Did the contractor  
address potential  
violations while  
onsite?

Yes

No

Make note of  
corrections and record  
inspection Checklist in  
LINKO Database

Provide 7 - 30 days to  
address issues and re-  
inspect site. Were  
violations still present?

No

Yes

Record inspection in LINKO Database  
If not resolved escalated to NOV  
- May result in fines  
- Inform NDEP of potential violations  
of State Industrial permit

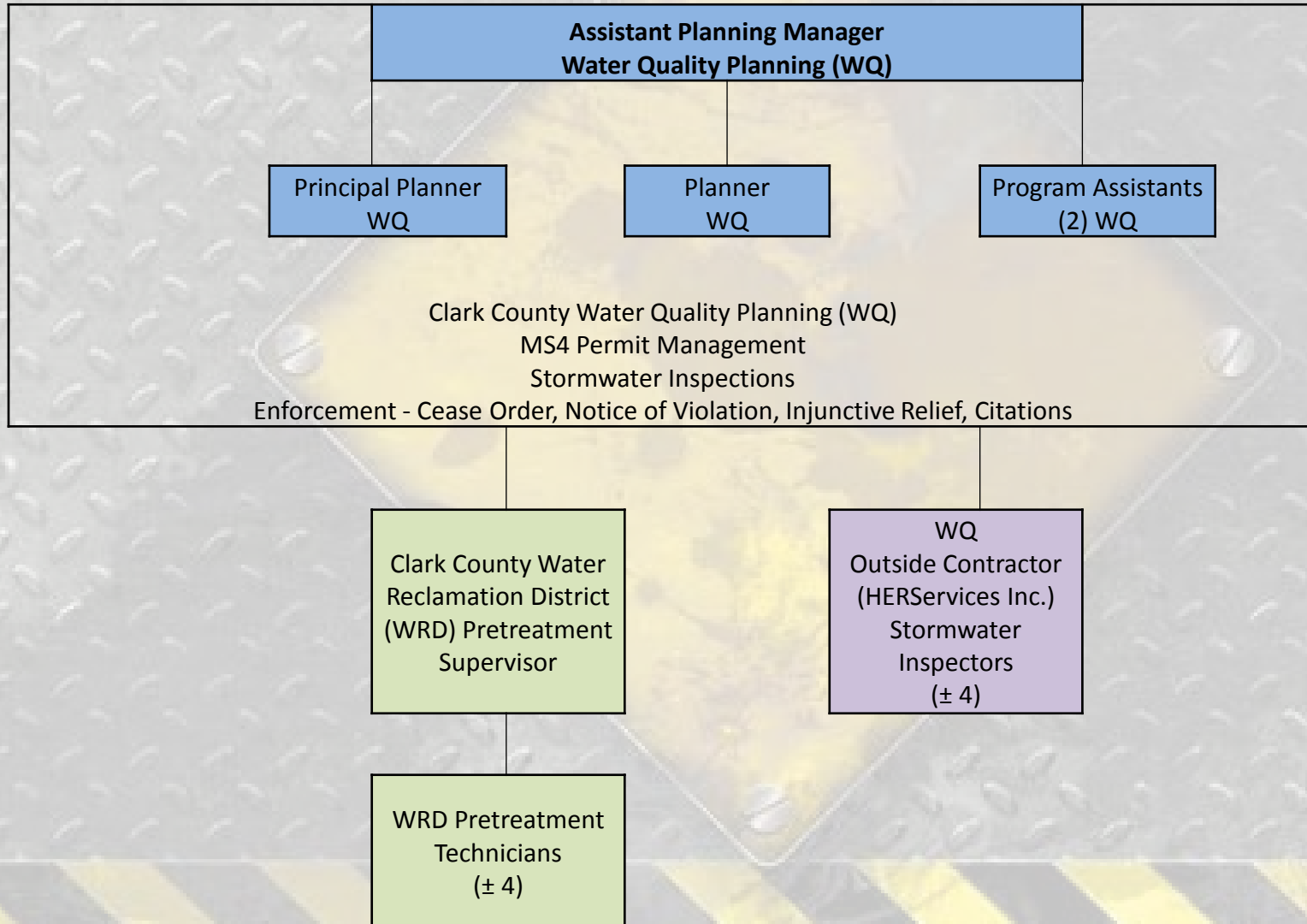
\* If an active illicit discharge is found the inspector should notify the site operator to stop the discharge immediately and process enforcement.



# Clark County MS4 Permit Organizational Chart



# Clark County Industrial Stormwater Enforcement Organizational Chart



# Clark County Enforcement Escalation Matrix

Inspector	Inspection Checklist with corrective actions	Follow-up Inspections with corrective action or compliance	Cease Order	NOV	Citation	Injunctive Order
WRD Pretreatment Inspector	x					
WQ Contractor	x	x				
WQ	x	x	x	x	x	x

# Clark County Water Reclamation District Industrial Stormwater Inspection Standard Operating Procedure (SOP)

**Purpose:** The purpose of this SOP is to identify the steps that need to be taken in order to complete a standard industrial stormwater inspection.

**Goals:** Use inspections as an education / outreach opportunity to train the facilities and provide industry related stormwater materials. If warranted and acceptable by the facility, offer to provide free training to key staff members at a later date. Learn about the facility and what chemicals they use and the potential they have to pollute. Compliance with Clark County Code Chapter 24.40 and the MS4 Permit.

**Scope:** This SOP is to be applied to all industrial facilities within the unincorporated Clark County portions of the Las Vegas Valley watershed that are identified as:

1. Municipal landfills
2. Hazardous waste treatment, disposal, and recovery facilities
3. Industrial facilities subject to Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (herein referred to as "313 sites"), and
4. Industrial facilities that the municipal permit applicant determines are contributing a substantial pollutant loading to the MS4. Possible candidate facilities include; (Pre-treatment-FOG, EPA 11-category, Fire Dept. Cat 1 & 2, and Business License category facilities.)

**Responsible Persons:** Ebrahim Juma, Assistant Planning Manager – Water Quality  
Joseph Leedy, Principal Planner – Water Quality  
Tina Pierson, Planner – Water Quality

**QA/QC:** This SOP is to be reviewed and updated by responsible persons every 2-3 years and whenever 24.40 is revised or there is a new MS4 permit issued.

**Industrial Inspection Procedure:** To be conducted for each industrial stormwater inspection:

## **Preparation - A few days before the inspection:**

1. Collect the facility information and complete as much of the inspection form as possible.
2. Prepare any brochures, handouts, educational materials and business cards that will be provided at the inspection.
3. For larger or more critical facilities, check to see if the BMP Documentation has been returned and get a copy to take on the inspection.
4. If the facility is notified of the inspection call or email the contact person and remind them of the inspection location, date and time. If the BMP Documentation has not been received remind the contact person that they should have a copy of it ready at the time of the inspection.
5. Print directions to the facility and if needed fuel vehicle.
6. Check Camera and make sure extra batteries and sufficient memory are available.
7. Confirm all required safety equipment is in good condition and ready for the inspection. (E.g. Steel toed shoes, Safety Glasses, Safety Vest, long sleeved shirt, hardhat, ear protection).

## **Day of the inspection:**

8. If an appointment has been made, give yourself plenty of time to drive to the facility (Arriving late is not professional). If you are early drive around the exterior of the site and look for previous and existing discharges (erosion, staining, discharge points, etc.) and/or look for other industrial facilities in the vicinity that could be inspected in the future.
9. Check in at the facility with all safety equipment on and ask to see the contact person.

10. Introduce yourself and provide a business card.
11. Briefly explain why you are there and the Clark County program, Chapter 24.40 and answer any questions.
12. If the inspection is a follow-up or re-inspection, check to see if deficient items have been corrected and skip to item 16.
13. At larger more critical facilities, review BMP Documentation. Ask about any missing information and/or have them fill it out and email it to you later.
14. Ask if they have an industrial stormwater permit and if you can review the facility SWPPP and NOI.
  - a. Review the SWPPP and NOI to see if they are current and check for discharge points and required BMPs.
  - b. If the facility does not maintain a SWPPP/NOI and the facility is a EPA 11-category facility, notify NDEP at 702-486-2850
  - c. Inform the facility contact person that you will email them information regarding the State permitting requirements including the SWPPP and NOI.
15. Review any past reports and SARA 313 issues and make sure the facility has addressed these problems with appropriate BMPs and SOPs.
16. Inspect the site with the contact person, if possible, using the latest inspection checklist developed by SQMC and taking photos of any issues. The inspector should walk the whole site checking outfalls and assessing the potential for discharge to the MS4 due to the amount and type of materials, handling and storage areas, and industrial process areas that are exposed to rainfall or runoff that constitute a discharge or potential to discharge any pollutant into the storm sewer system. Offsite gutters, drop inlets, and other storm drain infrastructure downstream of the facility outfalls should also be checked for signs of staining, odor, and contaminants.
17. If there is a discharge or potential to discharge, assess the health and safety risk.
  - a. If the discharge or potential to discharge is hazardous to health and safety, follow the facilities safety procedures, evacuate to a safe distance, notify the appropriate agencies (facility, Fire Department, State, etc.) Return to office, meet with supervisor and determine appropriate response, (Corrective action order / Inspection checklist with deadline, Cease Order, Notice of storm sewer violation (NOV), injunctive relief, citation, State spill report, etc.)
18. If the discharge or potential to discharge is not hazardous to health and safety
  - b. Find out if it is authorized by NDEP or exempt per Section 24.40.031 of Clark County Code.
    - i. If the discharge is authorized by NDEP review or get copies of their permit and monitoring data.
  - c. If the discharge is not authorized or exempt then notify the appropriate facility personnel to stop and/or cleanup the discharge immediately or as soon as practicable.
  - d. If there is a potential to cause or contribute to the discharge of any pollutant into the storm sewer system then notify the facility representative that a BMP(s) may be required.
  - e. Document the discharge or potential to discharge and continue the inspection (Item 16 above).
19. Fill out inspection form, as much as possible, at the site and ask any additional questions that may be needed to complete the form.
20. Compare the Inspection Form with the BMP Documentations and any previous inspections and clarify any discrepancies.
21. Review any violations, including items that the facility may need to consider for additional BMPs.
22. Ask the facility representative how long it will take to correct the items noted during the inspection. If reasonable this can be used for the deadline in the report.
23. Let the Contact know that a final decision about any required corrections, additional BMPs, NOV, Notice of Noncompliance, re-inspection, deadlines, etc. will be made after internal review at the office.
24. If warranted and acceptable by the facility, offer to provide free stormwater training for key staff members at a later date.

25. Thank the contact person for their time, let them know that a copy of the inspection report will be emailed to them, and depart.

## **Industrial Inspection Report Completion, Follow-up and Filing Procedures**

26. Complete the inspection report
  - a. If there are no significant issues complete the inspection report and email it to the facility contact.
  - b. If there is/are a significant violation(s) (discharge or potential to discharge):
    - i. Meet with the Assistant Planning Manager (Ebrahim Juma) and decide appropriate action. (Corrective action Order / Inspection Checklist with and deadline, Cease Order, NOV, injunctive relief, citation, State spill report, etc.)
    - ii. Complete the required paper work and send the report, deadline and any other documents to the facility representative. (See NOV SOPs)
27. Confirm the facility Contact received the documents and note any deadlines on your calendar for follow-up.
28. Follow-up
  - a. If there are significant violation(s) (discharge or potential to discharge), then re-inspect and/or confirm that the violation(s) have been corrected.
  - b. If there are significant violation(s) (discharge or potential to discharge), and the facility does not adequately and timely address the issue(s) outlined in the inspection report(s) or notices then review the project with the Assistant Planning Manager (Ebrahim Juma) and decide appropriate action. (Corrective action Order / Inspection Checklist with and deadline, Cease Order, NOV, injunctive relief, citation, State spill report, etc.)
  - c. If there are no problems with the facility or if all issues have been adequately addressed, review the inspection documentation with the Water Quality Team and decide the future inspection priority (annual, 2-5 years, not required, etc.)
29. If Re-inspection is required:
  - a. Enter next inspection date in Linko.
  - b. Start inspection (re-inspection) process over from beginning of this SOP.
30. Electronically file all reports, photos, emails, inspection logs and communication logs in the facility folder on the I: drive. (See Filing SOP for more information.)
31. Enter all data into the Linko database, which will show the date of last inspection, violations, & next inspection date.
32. If there is a significant stormwater issue at the facility or if the facility does not maintain a SWPPP/NOI and the facility is a EPA 11-category facility, notify NDEP at 702-486-2850
33. Notify other Departments or Agencies such as Business License, Public Works, Air Quality, SNHD, WRD, Fire Department, and SNWA if conditions warrant.

# **Clark County Stormwater Inspection Notice of Storm Sewer Discharge Violation (NOV) Standard Operating Procedure (SOP)**

**Purpose:** The purpose of this SOP is to identify the steps that need to be taken to complete a NOV in response to issues of stormwater management non-compliance or illicit discharge.

**Scope:** This SOP is to be applied to all stormwater inspections that constitute a violation of Clark County Code Chapter 24.40 and require voluntary compliance for one or more violations. This SOP is to be reviewed and updated by responsible persons every 2-3 years and whenever 24.40 is revised or there is a new MS4 permit issued.

**Responsible Persons:** Ebrahim Juma, Assistant Planning Manager – Water Quality  
Joseph Leedy, Principal Planner – Water Quality  
Tina Pierson, Planner – Water Quality

**QA/QC:** To be conducted and developed by the responsible persons based on the requirements of Clark County Code Chapter 24.40. This SOP is to be reviewed and updated by responsible persons every 2-3 years and whenever 24.40 is revised or there is a new MS4 permit issued.

## **Escalating Compliance Process:**

1. Utilize information from the Stormwater Inspection Process to identify items of non-compliance.
2. If existing discharge or the potential for discharge is present, draft a Notice of Violation (NOV) and Inspection Report/Corrective Action Order.
3. Review Notice of Violation and Inspection Report/Corrective Action Order with Supervisor.
4. Deliver Notice of Violation via email with “read receipt” requested, and via certified US Mail.
5. Did facility request hearing as described in Clark County Code Chapter 24.40?
  - a. If yes:
    - i. Setup hearing with the Hearing Officer
  - b. If no:
    - i. Re-inspect facility after the deadline given in the NOV to make the corrections to determine if existing discharge or the potential for discharge is present.
      1. If yes, injunctive relief.
      2. If no, assess fine, close case, finalize paperwork, and file case.
    - ii. Continue work and communication with facility to correct ongoing issues of non-compliance.
    - iii. Upon gaining compliance, complete final paperwork and close case.
6. Was the NOV confirmed by the Hearing Officer?
  - a. If yes:
    - i. Re-inspect facility to determine if existing discharge or the potential for discharge is present.
      1. If yes, injunctive relief.
      2. If no, assess fine, close case, finalize paperwork, and file case.
    - ii. Continue work and communication with facility to correct ongoing issues of non-compliance
    - iii. Upon gaining compliance, complete final paperwork and close case.
  - b. If no: Close case, finalize paperwork, and file case.





## Clark County Water Quality Program

Clark County Water Reclamation District

[waterquality@cleanwaterteam.com](mailto:waterquality@cleanwaterteam.com)

5857 E. Flamingo Road

Las Vegas, NV 89122

(702) 668-8674

December 3, 2015

US Post Office Receipt #: 7010 0290 0003 1513 0314

Mr. John Smith  
Acme Industries  
4529 E. Flamingo Road  
Las Vegas, NV 89122  
Parcel Number: 123-45-678-910

Re: Notice of Storm Sewer System Discharge Violation (NOV)

Good Afternoon, Mr. Smith:

This notice of violation (NOV) is to inform you of an alleged violation of Clark County Code Chapter 24.40 noted at Acme Industries, 4529 E. Flamingo Road. Receipt of the NOV is acknowledged by Certified Mail delivery notification.

During a stormwater inspection conducted November 30, 2015, approximately twenty gallons of an oil-like substance was observed to be spilled at the southeast corner of your loading dock. The substance traveled east across your property and was discharged from your site into the public right-of-way approximately 100 feet south of the intersection of Flamingo Road and Mountain Vista Street. Photographic documentation is attached. This places you in violation of the following Clark County Codes:

- **24.040.031(a):** "It shall be unlawful for any person to discharge or cause to be discharged into the storm sewer system any non-stormwater, unless the discharges has been authorized by NDEP and approved by the county manager..."
- **24.040.031(b):** "It shall be unlawful for any person to dispose or cause to be disposed any trash, construction debris, industrial waste materials, sewage or other pollutant into the storm sewer system."
- **24.40.042:** "Any condition caused or permitted to exist in violation of any provision of this chapter is a threat to public health, safety, and welfare, and is declared and deemed a nuisance per se."

**You are hereby directed to immediately stop the alleged violation, and take the following actions:**

- Cease all discharge activities immediately
- Clean existing discharged oil-like substance using appropriate clean up method, avoiding contamination of the storm drain system

**Compliance must occur no later than December 17, 2015. You must notify the representative listed below in writing as soon as these violations are corrected.**

In accordance with subsection 24.40.041(d) of the Clark County Code, you will be **subject to civil penalties not to exceed \$1000 for each day conditions are not corrected after the date specified above.**

If you disagree with this notice, you must request a hearing before the hearing officer by notifying the Assistant General Manager of Clark County Water Reclamation District, Collection System Services, in writing within ten

business days of service of this notice. See Clark County Code [applicable code here once revised] for additional information.

Thank you for your cooperation in this matter. Please contact Tina Pierson at 702-668-8672 or [tpierson@cleanwaterteam.com](mailto:tpierson@cleanwaterteam.com) to discuss any questions you may have.

Sincerely,

Ebrahim Juma  
Assistant Planning Manager

Encl: Clark County Chapter 24.40  
Photographic Documentation

EJ/TP



## Clark County Water Quality Program

Clark County Water Reclamation District

[waterquality@cleanwaterteam.com](mailto:waterquality@cleanwaterteam.com)

5857 E. Flamingo Road

Las Vegas, NV 89122

(702) 668-8674

Date

US Post Office Receipt #:

Name

Address

Re: Stormwater Cease Order / Issue, Address

Dear Property Owner or Facility Contact,

The purpose of this letter is to inform you of an alleged violation of Clark County Code Chapter 24.40 noted at the Address, Parcel or Location. Inspections at the site conducted on Date indicated Discribe Issue.

You are hereby directed to immediately stop the alleged violation, and take the following actions:

- Immediately cease all discharge activities.
- Clean and properly dispose of any contaminants left behind from the discharge.
- Develop and implement standard operating procedures to prevent future discharges.

**Compliance must occur no later than Compliance Date. You must notify the representative listed below in writing as soon as these violations are corrected. Send notification by email listed below or mail to the address listed above.**

Please be aware that any discharges to the storm drain system flow untreated into Lake Mead, which is the Las Vegas Valley's primary source of drinking water. Pollution of the storm sewer system can result in fines reaching \$1000 per day of violation. Enclosed please find a copy of Clark County's storm sewer regulations, Chapter 24.40 – Storm Sewer System Discharge.

Thank you for your cooperation in this matter. Please contact me at WQP contact phone number or WQP contact email to discuss this Cease Order or any other questions you may have.

Sincerely,

Water Quality Planning Contact

Title

Encl: Enclosures

WQP Staff Initials

## **Clark County Water Quality Program**

### **Standard Operating Procedure for Complaint / Spill Response**

**Purpose:** The purpose of this SOP is to identify the steps that need to be taken in order conduct a complaint / spill response.

**Scope:** This SOP is to be applied to all stormwater complaints received.

**Responsible Persons:** Ebrahim Juma, Assistant Planning Manager – Water Quality  
Joseph Leedy, Principal Planner – Water Quality  
Tina Pierson, Planner – Water Quality  
Cheyanne Cook – Water Quality  
Carra Pierce – Water Quality

**QA/QC:** To be conducted and developed by the responsible parties based on the requirements of Clark County Code Chapter 24.40.

#### **Complaint Response Procedures:**

1. Water Quality Team receives complaints from various sources including but not limited to the following:
  - a. NDEP Complaint/Spill Reports
  - b. EPA National Tips Database
  - c. WQ website: [www.ClarkCountyNV.com](http://www.ClarkCountyNV.com) Keyword “water quality”
  - d. WQ complaint email: [waterquality@cleanwaterteam.com](mailto:waterquality@cleanwaterteam.com)
  - e. WQ complaint phone: 702-668-8674
  - f. County Staff notification
  - g. Clark County Public Works Road Division wash walks
  - h. Clark County complaint system: <https://clarkconnect.clarkcountynv.gov/>
2. Once a complaint is received it is assigned to a staff member and it is logged into the WQ complaint/spill spreadsheet along with all pertinent information; complainant contact information (name, phone, email, mailing address), source and location of possible violation.
3. If the complaint / spill is active or an emergency see item 6 below.
4. Staff researches the complaint/spill including the following:
  - a. Jurisdiction (If not in Unincorporated Clark County go to # 5 below.
  - b. MS4 Permit and County Code Allowable discharges. If the discharge is allowable based on the following criteria in the MS4 Permit then note it in the complaint/spill spreadsheet and close the case.

**Non-stormwater discharges.** The Permittees are authorized to accept from other dischargers without requiring BMPs or other measures, to pass through their MS4s, and to discharge the following non-stormwater sources provided that the Nevada Division of

## Clark County Water Quality Program

### Standard Operating Procedure for Complaint / Spill Response

Environmental Protection ("NDEP") has not determined these sources to be substantial contributors of pollutants to the Permittees' MS4:

- i. Water line flushing;
- ii. Diverted stream flows;
- iii. Rising ground waters;
- iv. Uncontaminated groundwater infiltration (infiltration is defined as water other than wastewater that enters a sewer system, including sewer service connections and foundation drains, from the ground through such means as defective pipes, pipe joints, connections, or manholes. Infiltration does not include, and is distinguished from, inflow.);
- v. Discharges from potable water sources;
- vi. Foundation and footing drains;
- vii. Air conditioning condensate;
- viii. Irrigation water for lawns and landscaping;
- ix. Springs;
- x. Water from crawl space pumps;
- xi. Individual residential car washing;
- xii. Flows from riparian habitats and wetlands;
- xiii. De-chlorinated swimming pool discharges; (*Note; this is for residential pools only and if the residence is connected to the sanitary sewer then they should discharge to the sewer through the cleanout or other location.*)
- xiv. Street wash water, if no detergents or chemicals are used;
- xv. Discharges or flows from firefighting activities; and
- xvi. Dewatering activities not requiring separate discharge permits.

Note; Some of these discharges may be required to obtain a separate discharge permit from NDEP such as a Clean Water Discharge Permit, or NDEP General Permit.

- c. Location, address, parcel number, Property Owner, septic or sewer; <http://gisgate.co.clark.nv.us/opendoor/>
  - d. Business located on the subject property; <http://www.clarkcountynv.gov/business-license/services/Pages/BLSearch.aspx>
  - e. Past complaints, inspections, and enforcement actions at the subject site.
5. If the complaint/spill is not in Clark County's jurisdiction it is forwarded to other co-permittees or NDOT who owns many of the Right of Ways (ROW) within the Las Vegas Valley. The following is a list of contact information:
- |                         |                   |              |
|-------------------------|-------------------|--------------|
| a. City of Las Vegas    | Sherri McMahon    | 702-237-9351 |
| b. City of N. Las Vegas | Robert McLaughlin | 702-633-1252 |
| c. City of Henderson    | Albert Jankowiak  | 702-267-3024 |
| d. NDOT                 | Eric St. Sauver   | 702-682-2831 |

## **Clark County Water Quality Program**

### **Standard Operating Procedure for Complaint / Spill Response**

6. Depending on the type and severity of the complaint/spill it might also be directed to one or more of the following County Departments, Agency, etc.:

- a. Hazardous Spills or > 25 gals. in the public ROW contact the following people:

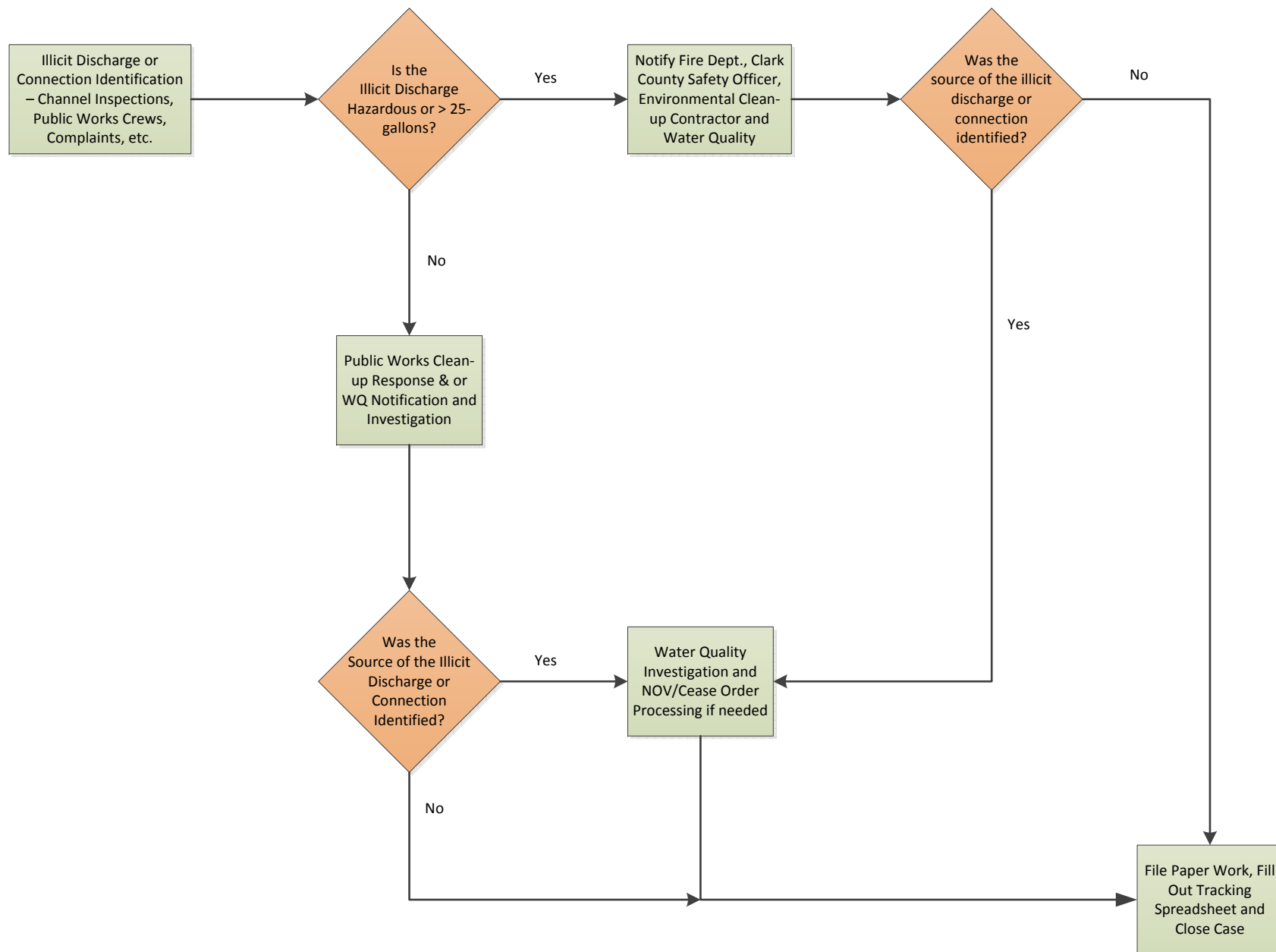
Safety Officer: Leigh Ann Anders	Cell: 702-413-5090 Office: 702-455-8586
Fire Dept.: Richard Brenner	Cell: 702-379-8623 Office: 702-455-7316
Fire Dept.: Robert G. Williams	Cell: 702-378-0173 Office: 702-455-7107
Emergency	911

- b. Clogged Storm Drains or non-hazardous Spills < 25- gals. in the Public ROW, contact Public Works at 702-455-7540
- c. Sanitary Sewer Overflow (SSO) or other sanitary sewer issues, Clark County Water Reclamation District:

Emergency Response Jeff Holzgrafe	Cell: 702-467-6297 Office: 702-668-8393
Cleaning & Complaints David Hanson	Cell: 702-218-6798 Office: 702-668-8366

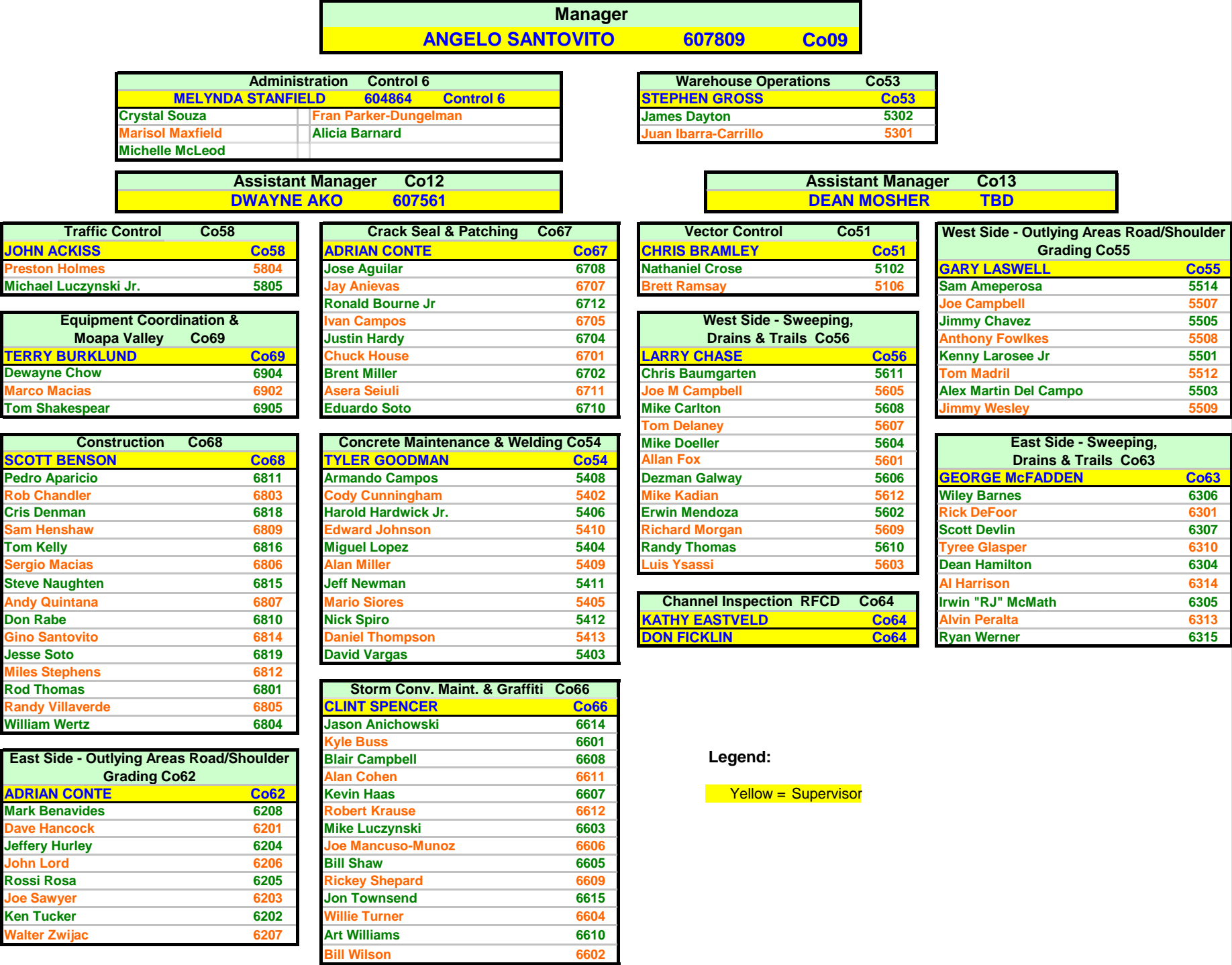
- d. Southern Nevada Health District (SNHD) 702-759-1000
- e. NDEP Spill Reporting Hotline 1-888-331-6337
7. After the research is done the inspector reviews complaint with supervisor. If an inspection is necessary, follow steps outlined in the "Clark County Water Reclamation District Industrial Inspection SOP" available at I:\Business Centers\Research and Technical Services\CC Water Quality\SOPs\Current. Begin complaint inspection at "Day of the Inspection" section of the Industrial Inspection SOP.
8. If a WQ inspection is not necessary it is noted in the database.
9. If needed the inspector drafts a "Cease Order" or "Notice of Violation" (NOV), SOP and template are available in the "current forms" folder at I:\Business Centers\Research and Technical Services\CC Water Quality\Stormwater\Current Forms.
10. Inspector reviews the Cease Order or NOV with supervisor and sends the notification certified mail with delivery confirmation and via email if possible. Follow procedures in the NOV SOP until closure is complete.
11. Electronic version of the Cease Order or NOV is saved in folder created for complaint based on the nomenclature outlined in the "Electronic Filing SOP" available at I:\Business Centers\Research and Technical Services\CC Water Quality\SOPs\Current.
12. Update the complaint/spill spreadsheet with actions taken and closure.
13. If warranted add the facility to the industrial inspection inventory.
14. If needed notify the source of the complaint with the results.

# Clark County Illicit Discharge Detection & Elimination (IDDE) Process

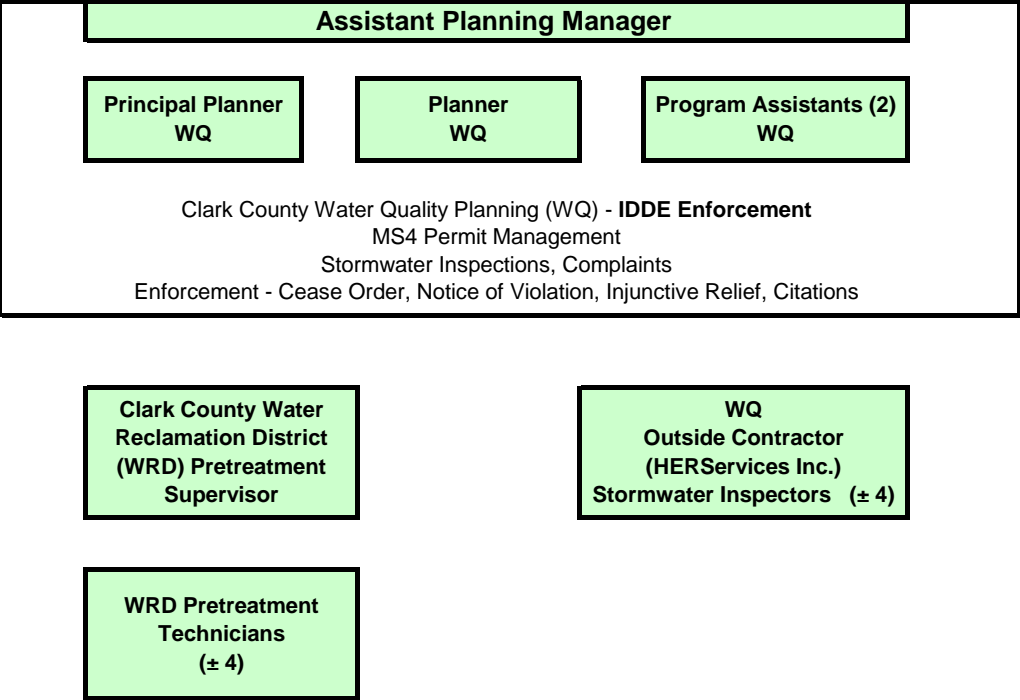


# Clark County Illicit Discharge Detection and Elimination (IDDE) Organizational Chart

## Public Works Road Division



## Water Quality Planning





# **Clark County IDDE Recent Case Examples**

## **Las Vegas Paving - Construction Project illicit discharge**

### **Back Ground**

Clark County Water Quality received NDEP Complaint/Spill Report No. 160314-05 on March 15, 2016. Water Quality Staff met with the Contractor and inspected the site located near the intersection of Lamb Blvd. and Rawhide St. on March 15, 2016. During the inspection the Contractor was directed to stop the illicit discharge.

An official Cease Order was prepared and delivered to the Contractor on March 17, 2016. The Cease Order directed the Contractor to do the following:

- Immediately cease the illicit discharge activities until adequate BMPs can be installed
- Inspect concrete lined channel on the North side of Rawhide Street between Lamb Blvd. and Mountain Vista Street and clean and properly dispose of any sediment deposits left behind from the discharge.

Water Quality staff met with the Contract and NDEP on March 17, 2016, to review the incident and possible solutions.

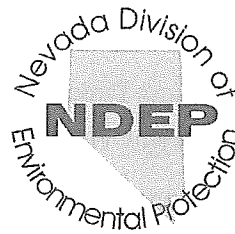
Las Vegas paving obtained approval from the Clark County Water Reclamation district to discharge the subject discharge that was too high in pH to the sanitary sewer.

Because of the prompt response no fines were issued to Las Vegas Paving from Clark County Water Quality.

### **Supporting Documents**

- **NDEP Spill Report # 160314-05**
- **20160317-Las Vegas Paving Cease Order**

NDEP # 160314-05



**Complaint/Spill Report Form**

State of Nevada

Report Date: 3/14/2016 Report Time: 1720

Incident Date: 3/11/2016 Incident Time: \_\_\_\_\_

Telephone: (888) 331-6337

Fax: (775) 687-8335

Do You Want to Remain Anonymous? ☐

Reporting Person: Sandra Donnelly

Reporting Agency: Clark County Water Reclamation District

Address: 5857 East Flamingo Road Phone: (702) 668-8888 Ext: 8070

City: Las Vegas State: NV Zip: 89122 Zip+4: \_\_\_\_\_

Discharger/Owner/Operator of Facility: PWI Construction Site

Address: near Lamb and Rawhide DOT#: \_\_\_\_\_

City: Las Vegas State: NV Zip: \_\_\_\_\_ Zip+4: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_ Ext: \_\_\_\_\_

APN#: \_\_\_\_\_ UST Facility ID / BWPC Permit #: \_\_\_\_\_

Location of Complaint/Spill: Construction Site, spill to surface water channel, high pH (G.T. 9)

Facility Address if different from discharger: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ County: \_\_\_\_\_

Township: \_\_\_\_\_ Range: \_\_\_\_\_ Section: \_\_\_\_\_ Q,Q2: \_\_\_\_\_ Mile Marker: \_\_\_\_\_

Type of Material Discovered: high pH water

Concentration/Analytical Data: Greater than 9 s.u.

Quantity Found: 500,000

Container: \_\_\_\_\_

Media Affected: Surface water

If UST, Confirmed Visually? \_\_\_\_\_

Cause of Complaint/Spill:

Construction site discharge was under Clark County Water Reclamation NPDES Permit (NV0024213). On Friday (3/11) contractor discharge high pH waters and the water found its way to Raw Hide Channel to Duck Creek to Las Vegas Wash.

Remedial Action Taken:

Construction company given a Cease and Desist Order per Sandra Donnelly

Oversight/Enforcement:

Email Address:

NDEP BWPC Joe Maez & Others - NDOT - Michael Simm

jmaez@ndep.nv.gov; clawson@ndep.nv.gov; kpas

cc: NDEP BCA Remediation/Mobile Source South Todd Croft

tcroft@ndep.nv.gov; ssmale@ndep.nv.gov; lmccl

cc: \_\_\_\_\_

alanza@ndep.nv.gov

cc: \_\_\_\_\_

Comments:

Report Taken By: Carlton Parker



## Clark County Water Quality Program

Clark County Water Reclamation District

[waterquality@cleanwaterteam.com](mailto:waterquality@cleanwaterteam.com)

5857 E. Flamingo Road

Las Vegas, NV 89122

(702) 668-8674

March 17, 2016

US Post Office Receipt #: 7015 0640 0000 5768 4577

Mr. Troy Hildreth  
Las Vegas Paving  
4420 S. Decatur Blvd.  
Las Vegas, NV 89103-5803

Re: Stormwater Cease Order

Good Morning, Mr. Hildreth:

The purpose of this letter is to inform you of an alleged violation of Clark County Code Chapter 24.40 noted at the intersection of Lamb Blvd. and Rawhide Street beginning on March 11, 2016. Inspections at the site conducted on March 11, 2016 and March 14, 2016 indicated high pH levels and a white chalky material being discharged.

You are hereby directed to immediately stop the alleged violation, and take the following actions:

- Immediately cease all discharge activities until adequate BMPs can be installed.
- Inspect concrete lined channel on the North side of Rawhide Street between Lamb Blvd. and Mountain Vista Street and clean and properly dispose of any deposits of sediment left behind from the discharge.
- Inspect any similar installations in the Las Vegas Valley and confirm they are functioning properly and have adequate BMPs.

**Compliance must occur no later than March 24, 2016. You must notify the representative listed below in writing as soon as these violations are corrected. Send notification by email listed below or mail to the address listed above.**

Thank you for your cooperation in this matter. Please contact Joe Leedy at 702-668-8673 or [JLeedy@cleanwaterteam.com](mailto:JLeedy@cleanwaterteam.com) to discuss any questions you may have.

Sincerely,

Joseph Leedy  
Principal Planner

Encl: Clark County Chapter 24.40

## **5490 Tami Place - illicit connection**

### **Back Ground**

During Clark County Public Works Fall channel inspections they identified a pipe coming out the residential block wall into a concrete lined channel that runs along the north side of Rawhide Street. The pipe was not flowing at the time of the inspection. Public Works notified Water Quality who did an inspection of the site on September 17, 2015.

An official Cease Order and the inspection report was sent to 5490 Tami Place on September 17, 2015 was prepared and delivered to the Contractor on March 17, 2015. The Cease Order directed the property owner to remove the pipe.

Water Quality staff re-inspected the site on November 12, 2015, and verified the pipe had been removed.

The pipe was a swimming pool discharge and the property owner was directed to drain their swimming pool to the sanitary sewer. No fine was issued because dechlorinated swimming pool water is an allowed discharge.

### **Supporting Documents**

**9/17/15 Inspection Report**

**9/17/15 Cease Order**

**11/12/16 Inspection Report verifying pipe was removed**



## Clark County Water Quality Program

Clark County Water Reclamation District

[waterquality@cleanwaterteam.com](mailto:waterquality@cleanwaterteam.com)

5857 E. Flamingo Road

Las Vegas, NV 89122

(702) 668-8674

### Stormwater Guidance Inspection

Inspection ID#:		Notify State: Yes <input type="radio"/> No <input checked="" type="radio"/> X		Inspection Date: 9/17/15	
Business Name: Current Resident				Inspection Time: 10:50 a.m.	
Business Contact:		Title:		Phone:	
Email:					
Street Address: 5490 Tami Place					
Suite/Unit:		City: Las Vegas		State: NV Zip Code: 89120	
Inspection Type: Annual <input type="radio"/> Periodic <input type="radio"/> Follow-up <input type="radio"/> Complaint <input type="radio"/> Other <input checked="" type="radio"/> Wash Walk - Residential IDDE Follow-up					
Literature Delivered: Regulations <input type="radio"/> Brochure(s) <input type="radio"/> BMP Documentation <input type="radio"/> To be filled out and returned by: _____ Pending _____					
Conduct Facility Staff Training <input type="radio"/> Yes <input type="radio"/> No					
Facility Type (NAICS Description):					
NAICS Code(s):		Parcel Number(s): 161-29-317-007			

Yes <input type="radio"/> No <input checked="" type="radio"/> N/A <input type="radio"/>	Is the site free of evidence of existing or past pollutant discharges?
Yes <input type="radio"/> No <input type="radio"/> N/A <input checked="" type="radio"/>	Are materials, equipment storage, maintenance areas, & waste managed adequately to minimize the potential to pollute?
Yes <input type="radio"/> No <input type="radio"/> N/A <input checked="" type="radio"/>	Are Best Management Practices (BMPs) installed, functioning properly, and adequately maintained?
Yes <input type="radio"/> No <input type="radio"/> N/A <input checked="" type="radio"/>	Is vehicle and/or equipment washing done in a designated area so that the wash water can be discharged to the sanitary sewer through an approved pre-treatment method?
Any Items marked "No" may require additional BMPs or proper implementation/maintenance of current BMPs	

**Inspection Reason:** Educate the facility about stormwater regulations and Best Management Practices (BMPs).  
Inspection of facility for compliance with County stormwater regulations (Clark County Code Chapter 24.40).

#### Inspection Comments:

The illicit connection identified during the Public Works wash walk was confirmed. A Cease Order will be sent to the current resident regarding the illicit connection shown in the photo below.

General

- Facility needs to be aware of all regulations governing the management of stormwater and non-stormwater on its grounds.
- Facility needs to be aware of all storm drain facilities and where they drain to.
- Storm drain infrastructure should be regularly inspected and maintained and a record of those activities should be kept.
- All chemical / liquid containers stored outside are required to have the following: labels, sealed openings, and secondary containment or approved equal. Containers that are completely empty do not need secondary containment.
- Trash containers should be labelled and have lids to prevent the transport of contaminants by wind and rain.
- Clark County Code Chapter 24.40, storm sewer system regulations do not allow non-stormwater discharges off of the site unless expressly permitted by the Nevada Division of Environmental Protection

**Follow-up Required:** Yes ☒ No ☐ **Required Corrections Completion Date:** 10/31/15

#### Clark County Water Reclamation District Inspector

<b>Name:</b>	Joseph R. Leedy	<b>Title:</b>	Principal Planner
<b>Phone:</b>	702-668-8673	<b>Email:</b>	JLeedy@cleanwaterteam.com
<b>Signature/Date</b>			



# Clark County Water Quality Program

Clark County Water Reclamation District

[waterquality@cleanwaterteam.com](mailto:waterquality@cleanwaterteam.com)

5857 E. Flamingo Road

Las Vegas, NV 89122

(702) 668-8674

## 5490 Tami Place



### Illicit Connection




## Clark County Water Quality Program

Clark County Water Reclamation District

[waterquality@cleanwaterteam.com](mailto:waterquality@cleanwaterteam.com)

5857 E. Flamingo Road

Las Vegas, NV 89122

(702) 668-8674

September 17, 2015

US Post Office Receipt #: 7010 0290 0003 1513 0383

Current Resident  
5490 Tami Place  
Las Vegas, NV 89120

Dear Current Resident,

Re: Stormwater Guidance/Cease Order  
Illicit Connection to Storm Drain at 5490 Tami Place, Las Vegas, NV 89120

The purpose of this letter is to follow up on an illicit connection complaint received about a PVC pipe running from the back yard of 5490 Tami Place into the storm drain channel adjacent to the property. Additionally there is staining on the concrete channel from what appears to be contaminants dumped over your block wall. See attached Photos. These types of activities are possible violations of Clark County Code and should be stopped immediately and the PVC pipe should be removed.

Please be aware that water that flows into the storm drain system drains untreated into Lake Mead, which is the Las Vegas Valley's primary source of drinking water. Enclosed please find copy of Chapter 24.40 – Storm Sewer System Discharge, Clark County's storm sewer regulations as well as other literature about stormwater.

Thank you for your cooperation in this matter. Please contact Joe Leedy at 702-668-8673 or [JLeedy@cleanwaterteam.com](mailto:JLeedy@cleanwaterteam.com) to discuss this complaint or any other questions you may have.

Sincerely,

Joe Leedy  
Principal Planner

Encl: Photo Showing Pipe  
Clark County Code, Chapter 24.40 – Storm Sewer System Discharge  
Only Rain in the Storm Drain Flyer  
Household Hazardous Waste Flyer

JL









## Clark County Water Quality Program

Clark County Water Reclamation District

[waterquality@cleanwaterteam.com](mailto:waterquality@cleanwaterteam.com)

5857 E. Flamingo Road

Las Vegas, NV 89122

(702) 668-8674

### Stormwater Guidance Inspection

Inspection ID#:	Notify State: Yes <input type="radio"/> No <input checked="" type="radio"/> X	Inspection Date: 11/12/15
Business Name: Current Resident		Inspection Time: 10:30 a.m.
Business Contact:	Title:	Phone:
Email:		
Street Address: 5490 Tami Place		
Suite/Unit:	City: Las Vegas	State: NV Zip Code: 89120
Inspection Type: Annual <input type="radio"/> Periodic <input type="radio"/> Follow-up <input type="radio"/> Complaint <input type="radio"/> Other <input checked="" type="radio"/> Wash Walk - Residential IDDE Follow-up		
Literature Delivered: Regulations <input type="radio"/> Brochure(s) <input type="radio"/> BMP Documentation <input type="radio"/> To be filled out and returned by: _____ Pending _____		
Conduct Facility Staff Training <input type="radio"/> Yes <input type="radio"/> No		
Facility Type (NAICS Description):		
NAICS Code(s):	Parcel Number(s): 161-29-317-007	

Yes <input type="radio"/> No <input checked="" type="radio"/> N/A <input type="radio"/>	Is the site free of evidence of existing or past pollutant discharges?
Yes <input type="radio"/> No <input type="radio"/> N/A <input checked="" type="radio"/>	Are materials, equipment storage, maintenance areas, & waste managed adequately to minimize the potential to pollute?
Yes <input type="radio"/> No <input type="radio"/> N/A <input checked="" type="radio"/>	Are Best Management Practices (BMPs) installed, functioning properly, and adequately maintained?
Yes <input type="radio"/> No <input type="radio"/> N/A <input checked="" type="radio"/>	Is vehicle and/or equipment washing done in a designated area so that the wash water can be discharged to the sanitary sewer through an approved pre-treatment method?
Any Items marked "No" may require additional BMPs or proper implementation/maintenance of current BMPs	

Inspection Reason: Educate the facility about stormwater regulations and Best Management Practices (BMPs).  
Inspection of facility for compliance with County stormwater regulations (Clark County Code Chapter 24.40).

#### Inspection Comments:

The illicit connection identified during the Public Works wash walk was REMOVED.

General

- Facility needs to be aware of all regulations governing the management of stormwater and non-stormwater on its grounds.
- Facility needs to be aware of all storm drain facilities and where they drain to.
- Storm drain infrastructure should be regularly inspected and maintained and a record of those activities should be kept.
- All chemical / liquid containers stored outside are required to have the following: labels, sealed openings, and secondary containment or approved equal. Containers that are completely empty do not need secondary containment.
- Trash containers should be labelled and have lids to prevent the transport of contaminants by wind and rain.
- Clark County Code Chapter 24.40, storm sewer system regulations do not allow non-stormwater discharges off of the site unless expressly permitted by the Nevada Division of Environmental Protection

Follow-up Required: Yes ☐ No ☒ X Required Corrections Completion Date: N/A

#### Clark County Water Reclamation District Inspector

Name:	Joseph R. Leedy	Title:	Principal Planner
Phone:	702-668-8673	Email:	JLeedy@cleanwaterteam.com
Signature/ Date			



## Clark County Water Quality Program

Clark County Water Reclamation District

[waterquality@cleanwaterteam.com](mailto:waterquality@cleanwaterteam.com)

5857 E. Flamingo Road

Las Vegas, NV 89122

(702) 668-8674

5490 Tami Place		

# **Clark County Stormwater Program Record Retention Policy Standard Operating Procedure**

**Purpose:** The purpose of this SOP is to ensure that essential records and documents relating to the Las Vegas Valley National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) permit are properly protected and maintained per legal requirements.

**Scope:** This SOP is to be applied to all records generated in the course of Clark County Water Quality Planning business that relate to the NPDES MS4 permit, including but not limited to: emails, database records, stormwater inspection forms, photographic documentation, Cease Orders, NOVs, and reports.

**Responsible Persons:** Ebrahim Juma, Assistant Planning Manager – Water Quality  
Joseph Leedy, Principal Planner – Water Quality

**QA/QC:** To be conducted and developed by the responsible parties based on the requirements of Clark County Code Chapter 24.40 and any additional relevant legal documents pertaining to record retention policies related to the NPDES MS4 permit.

## **Record Retention Policy:**

1. Clark County Water Quality NPDES MS4 records are kept a minimum retention period of three years after the MS4 Permit expires as required by the NDEP. Records may be retained for a longer time period should business needs dictate.
2. Records are maintained in an electronic format on Clark County Water Reclamation District computer systems.
3. Some supporting documentation is saved by the Clark County Public Works and Building Departments.

The following is a summary of MS4 Permit programs that electronic records are kept for, including the responsible Department and the types of records that are kept:

## **Public Outreach and Education Program-**

### **Water Quality Department**

- The name and type of Outreach and Education events and number of attendees
- Photos from the Outreach and Education events
- Number and types of Outreach and Education flyers printed each fiscal year
- Number and types of new Outreach and Education materials developed each fiscal year
- Number of “Don’t Pollute Drains to Lake Mead” storm drain marker plaques purchased
- Annual MS4 Permit Report

# **Clark County Stormwater Program Record Retention Policy Standard Operating Procedure**

## **Source Control and MS4 Maintenance Program-**

Public Works Road Division and Water Quality Department

- Street sweeping miles and quantity of material removed
- Number of curbed miles in jurisdiction
- Number of drop inlet inspected / cleaned, and quantity of material removed
- Number of drop inlets in jurisdiction
- Number of detention basins inspected / cleaned, and quantity of material removed
- Number of detention basins in jurisdiction
- Spring and Fall Channel/Wash Inspection Reports
- Public Facility Maintenance Plans and updates

## **Post-Construction Program for New Development and Significant Redevelopment-**

Public Works and Water Quality Departments

- Number of drainage studies reviewed
- Number and type of post construction BMPs installed
- Post-construction project location and size

## **Illicit Discharge Detection Program-**

Public Works Road Division and Water Quality Department

- Number of complaint / spill inspections with corrective actions
- Number of Cease Orders
- Number of NOVs
- Total Fines
- Spring and Fall Channel/Wash Inspection Reports

## **Industrial Facility Monitoring and Control Program-**

Water Quality Department

- Number of industrial stormwater inspections with corrective actions
- Number of Cease Orders
- Number of NOVs
- Total Fines

## **Construction Site Program-**

Water Quality Department, Building Department, and Public Works

- Number of construction stormwater inspections with corrective actions
- Number of Cease Orders
- Number of NOVs
- Total Fines

## **Staff and Resources-**

Water Quality Department

- Annual stormwater budget and resource information